

### REMARKS

In the office action dated June 30, 2005, Claims 1-13 and 59 were objected for informalities. Claims 1, 13, 58 and 59 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,095,628 to Rhome in view of U.S. Patent No. 5,188,034 to Iaccino et al. Claims 2-12 were rejected under 35 U.S.C. 103(a) as being unpatentable over Rhome in view of Iaccino et al as applied to 1, 13, 58 and 59 and further in view of U.S. Patent No. 6,286,237 to Toutounchian.

#### Objections to Claim 1-13 and 59

In response to the informalities objection to Claim 1 that the claim do not reflect the exact nature of the invention and to the use of the term “the closing” lacking an antecedent basis, the Applicants have rewritten Claim 1 by removing the phrase that contain the term “the closing”. In response to the informality objection to Claim 59, Applicants have removed the word “the” as suggested in the Office Action. Withdrawal of the objections against Claim 1, Claims 2-13 which depends on Claim 1, and Claim 59 are respectfully requested.

#### Rejection of Claims 1, 13, 58 and 59

In response to the U.S.C. 103(a) rejection of Claims 1, 13, 58, and 59, as being unpatentable over Rhome in view of Iaccino, Applicants have cancelled claim 58. Accordingly, the rejection of claim 58 is considered moot.

With regards to claims 1, 13, and 59, Applicants respectfully point out that the combination of Iaccino and Rhome does not teach or suggest all the limitation of claims 1, 13, and 59. First, Iaccino does not disclose two separate distances between 1) the inkjet head and the neck/shoulder portion, and 2) the inkjet head and the section of the t-shirt other than the neck/shoulder portion. Two separate distances are formed in the presently claimed invention as

disclosed in Figure 6 of this application. The neck cutout of the lower panel of Iaccino is provided so that the thickened neck portion of a T-shirt does not preclude the upper panel from laying flat upon the lower panel (see column 9, lines 9-15). Likewise, Rhome does not fill this void left behind by Iaccino. The combination of Iaccino and Rhome does not teach or suggest, two predetermined distances from the inkjet head which is exemplified in Figure 6. Thus, all claim limitations of the presently claimed invention are not present when Iaccino and Rhome are combined.

#### Rejection of Claims 2-12

The Office Action rejected Claims 2-12 as unpatentable under 35 U.S.C. 103(a) over Rhome in view of Iaccino as applied to claims 1, 13, 58, and 59, and further in view of U.S. Patent 6,286,237 to Toutouchian. In view of the cancellation of claim 58, the rejection of claim 58 is deemed moot.

First, as stated above in the applicants' remarks for the rejection of claim 1, the combination of Rhome and Iaccino does not teach or suggest all the limitations of claims. The combination does not disclose the two separate distances as exemplified in Figure 6 of this application as described above. Combining Rhome and Iaccino with Toutouchian does alter this fact.

Additionally, Toutouchian is related to an ironing board, which is in a different technical field from this application and of the technical field of Rhome and Iaccino. Thus, one skilled in the art would not be motivated to combine Toutouchian with Rhome and Iaccino. Stated otherwise, Toutouchian is non-analogous art.

Moreover, the Office Action points out in claims 2 and 3 that the guide plate of the present invention is similar to the member 36 of the cited reference to Toutouchian. However,

Toutouchian does not disclose that the member 36 protrudes in the longitudinal direction, which is the auxiliary scanning direction to the guide plate of the present invention. Therefore when Toutouchian is combined with Rhome and Iaccino, the combination lacks the limitations found in the claims 2 and 3.

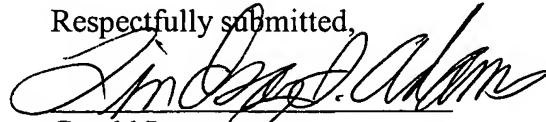
For Claims 4-7, the Office Action points out Toutouchian discloses the shape of the member 36 of the ironing board. However, Toutouchian does not teach or suggest how the edge of member 36 is shaped or whether it is effective in holding the fabric. The shape of the guide plate of the presently claimed invention set forth in claims 4-7 (i.e., the guide plate is symmetric to the centerline, a front end side of the guide plate has an arc-shaped side, and the guide plate has a V-shaped side), is disclosed as being effective to position the fabric in place. Because Toutouchian does not suggest the effectiveness of holding the fabric in place, there is no motivation or suggestion for one to combine Toutouchian, which is directed toward an ironing, with Rhome and Iaccino.

In rejecting Claims 8-12, the Office Action points out that Toutouchian discloses the member 36 having rounded edges. However, Toutouchian does not teach or suggest that the shape of the edges of the member 36 is effective to prevent the fabric from being damaged or floating up from the platen. As a result, there is no suggestion or motivation for one to combine Toutouchian with Rhome and Iaccino. This lack of motivation is especially true since Toutouchian is directed to an ironing board, which is in a different technical field from this application and that of Rhome and Iaccio.

In view of the above amendments and remarks, Applicants submit the application which applicants believe is in condition for allowance. An early examination and allowance of the application is respectfully solicited.

Applicants do not believe that any fees are due. However, if any additional fees are due, please charge such sums to our Deposit Account 50-1145.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gerald Levy", written over a horizontal line.

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